

REPORT ON THE TRANSFER OF
WOMEN FROM THE MOURNE HOUSE UNIT,
MAGHABERRY PRISON TO HYDEBANK WOOD YOUNG
OFFENDERS UNIT
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EXECUTIVE SUMMARY

I'll be honest with you, if this move takes place I don't know how I'll survive because I'm absolutely no good with confrontation. You might think I'm assertive ... It's got that way that you don't voice anything and I can't see how I could handle the things we'll face with the move. (Woman prisoner in Mourne House)

It took me [a long time] to settle here ... now I'm to be uprooted. How long will it take me to settle there? I'm really used to being here ... it's just not fair and they are taking us back in time. Surely if they're going to move us they should be taking us ahead in time, improving things instead of taking things away. (Woman prisoner in Mourne House)

1. This report arises out of independent research carried out on behalf of the Northern Ireland Human Rights Commission into the treatment of women and girls in custody.
2. On 24 April 2004 the Northern Ireland Prison Service announced its decision to re-locate female prisoners (including immigration detainees) from Mourne House,¹ Maghaberry to Ash House a unit within Hydebank Wood Young Offenders Centre Belfast.²
3. This transfer is expected to happen before the end of June 2004.
4. The issue of this proposed transfer of women and girl prisoners has formed part of the research and, in the circumstances, it is considered appropriate that a separate

¹ Male immigration detainees will be moved to the 'working out centre' at HMP Belfast, Crumlin Road.

² Maghaberry Prison is situated 20 miles from Belfast and is a high security prison housing a wide range of adult male and female prisoners. Hydebank Wood currently detains young male prisoners. At Mourne House women are housed in "a small self-contained unit, which is discrete accommodation housing up to 49 prisoners and is separate from Maghaberry male prison" (Northern Ireland Prison Service, EQIA p12). In 2003 women made up just 1% of the total prison population in Northern Ireland.

report on this be submitted. The full research report will be submitted in July 2004.

5. This report outlines the relevant human rights standards on the treatment of women in prison; summarises the context of the proposed move; outlines the views of key players as expressed to the researchers and makes conclusions on the proposed transfer.
6. International human rights principles and the Prisons Inspectorate standards state that women prisoners should preferably be held in female-only establishments. Where a mixed-gender location cannot be avoided certain safeguards must be met including complete physical separation, separate management, health, education, visiting and transport.
7. In its most recent inspection of Maghaberry in 2002 the Prisons Inspectorate recommended that Mourne House should be declared a discrete female facility; the Prison Service should draw up a policy and strategic plan for the treatment of women in custody for delivery in Mourne House; all staff and managers should receive specific training on dealing with women in custody, security levels in Mourne House should be reduced and the discrete healthcare facility for women on the site should be reopened.³ Since that inspection, however, both the regime and facilities for women in Mourne House have been allowed to deteriorate to the detriment of the women imprisoned there.
8. In deciding to transfer women and girl prisoners to Hydebank Wood little consideration appears to have been given to the central issues of concern raised by the Inspectorate and its recommendations.
9. Women are being moved from a female unit in a high security male establishment to a female unit in a lower security male young offenders centre. The problems associated with holding women in male establishments have not been adequately addressed.

³ HMIP Mourne House Inspection, paras MH.06, MH.07, MH.09, MH.10 and MH.11.

10. In contradiction to the Inspectorate's recommendations for the treatment of women: there will not be full physical separation in Hydebank; there will not be autonomous management for the women's unit; there is no separate health care facility for women; there will be mixed gender visits and kitchen duty; the cells are smaller; there is no in-cell sanitation⁴ (which women in Mourne House currently have); staff have not been effectively trained in dealing with the needs of women; there has been no full needs assessment of the women currently held in Maghaberry.

11. The main concern voiced by all women prisoners was that they would have to live in a predominantly male environment where core facilities would be shared. Some women were very afraid that they would not be able to cope with the transfer.

12. In conclusion, while the research will demonstrate the unacceptability of the regime at Mourne House, the report recommends that the Northern Ireland Prison Service abandon the move to Hydebank and consult more widely on the future of women in prison in Northern Ireland.

13. The speed with which the transfer is scheduled to take place raises further concern. The first months of the transfer will be traumatic for women yet the facilities essential for their care will not be in place.

⁴ The installation of in-cell sanitation was one of the main recommendations of the Woolf report, published in 1991, after the Strangeways riots. Yet, the Northern Ireland Prison Service is electing to move women prisoners from cells with in-cell sanitation to cells with no such amenities.

CONTEXT

This report arises out of independent research being carried out on behalf of the Northern Ireland Human Rights Commission into the treatment of women and girls in custody and its compliance with human rights law and standards. On 24 April 2004 the Northern Ireland Prison Service announced its decision to re-locate female prisoners (including immigration detainees) from Mourne House,⁵ Maghaberry to Ash House a unit within Hydebank Wood Young Offenders Centre, Belfast. Maghaberry Prison is situated 20 miles from Belfast and is a high security prison housing a wide range of adult male and female prisoners. Hydebank Wood currently detains only young male prisoners.⁶

The proposed transfer of women and girl prisoners has formed part of the research and, in the circumstances, it is considered appropriate that a separate report be submitted dealing with the imminent transfer and its implications. The full research report will be submitted in July 2004.

This report outlines the relevant human rights standards on the treatment of women in prison; summarises the context of the proposed move; outlines the views of key players as expressed to the researchers and makes conclusions on the proposed transfer.

Introduction

Recent academic research and international standards regarding the imprisonment of women and girls emphasise two guiding principles. First, in response to a body of evidence that women's experiences of prison are significantly different to those of men, it is expected that the conditions under which women are held and the regimes under which they live their daily lives are distinctive, discrete and gender-specific. Second, while the numbers of women and girls in prison are relatively low, they should receive equal treatment to men and boys in

⁵ Male immigration detainees will be moved to the 'working out centre' at HMP Belfast, Crumlin Road.

⁶ At Mourne House women are housed in "a small self-contained unit, which is discrete accommodation housing up to 49 prisoners and is separate from Maghaberry male prison." Northern Ireland Prison Service, EQIA p12. In 2003 women made up just 1% of the total prison population in Northern Ireland Northern Ireland Office, Research & Statistical Bulletin 2/2004.

the provision of resources, conditions, health-care, work, leisure and education opportunities, prisoner programmes, sentence management, pre-release support and through-care provision. They should not be marginalised or disadvantaged because they are few.⁷

It appears that these complementary principles cause confusion for senior prison managers and prison officers, reflecting a commonly held assumption that 'equality of opportunity' means 'same treatment'. A correspondent to the prisons inspectorate aptly expressed the phenomenon:

It is not merely a question of women receiving equal treatment to men; in the prison system equality is everywhere conflated with uniformity; women are treated as if they **are** men.⁸

This view depicts women prisoners as 'cons with skirts'.⁹

In providing gender-appropriate policies and practices institutions should identify, assess and resource the needs of distinct groups. The policy foundations for women and girls in prison should be: the initiation and delivery of women-centred strategies; the generic identification and specific assessment of needs; the provision of gender-specific programmes to meet those needs; the holding of women and girls in discrete, separate and self-contained facilities; the operation of regimes by managers, officers and other professional staff specifically trained to work with women and girls in custody.¹⁰

Accommodation should include in-cell sanitation and ablutions,¹¹ bath as well as shower provision,¹² mother and baby units,¹³ well-equipped recreation and kitchen areas.¹⁴ Regimes should not be

⁷ These principles were brought together by the prisons inspectorate in its thematic reviews of the imprisonment of women: Her Majesty's Chief Inspector of Prisons, 1997, *Women in Prison: A Thematic Review*, HMSO (hereafter *HMIP Thematic Review*) and Her Majesty's Chief Inspector of Prisons, 2001, *Follow-up to Women in Prison*, HMSO (hereafter *HMIP Follow-up*). See especially chapter 3 of *Women in Prison: A Thematic Review* for discussion of the importance of discrete regimes for women.

⁸ *HMIP Thematic Review*, para 3.46.

⁹ *HMIP Thematic Review*, para 3.46.

¹⁰ *HMIP Thematic Review*, chapters 3 and 4.

¹¹ Woolf, LJ, 1990, *Report of an Inquiry by Lord Justice Woolf and His Hon. Judge Stephen Tumin: Prison Disturbances* April 1990, Cmnd 1456 London, The Stationary Office.

¹² Carlen, P, 1998, *Sledgehammer: Women's Imprisonment at the Millenium*, Macmillan

¹³ *HMIP Thematic Review*, chapter 9.

¹⁴ Her Majesty's Inspectorate of Prisons, 2004, *Expectations: Criteria for assessing the conditions in prisons and the treatment of prisoners*, HMSO (hereafter *HMIP Expectations*, sections 5 and 7.

based on a 'reward' system and should provide: sensitive and supportive reception and induction;¹⁵ full information on the operation of the prison;¹⁶ a personal officer scheme¹⁷ supported by regular access to independent counsellors; gender-appropriate health-care on and off site including ante and post natal care;¹⁸ maximum unlock and association; daily work, education and physical education opportunities;¹⁹ offending behaviour programmes.²⁰

In its most recent inspection of Maghaberry in 2002 the Prisons Inspectorate translated these principles into recommendations in the context of Mourne House. These included the recommendations that Mourne House should be declared a discrete female facility; the Prison Service should draw up a policy and strategic plan for the treatment of women in custody; for delivery in Mourne House; all staff and managers should receive specific training on dealing with women in custody, security levels in Mourne House should be reduced and the discrete healthcare facility for women on the site should be reopened.²¹

The Transfer in Context

In March 2003 the Prison Service Management Board commissioned a 'feasibility study' into the possible transfer of women prisoners from Mourne House Maghaberry to Ash House, a unit within Hydebank Wood Young Offenders Centre, Belfast.²² The key terms of reference were: reduction in staffing levels; better use of Hydebank Wood's spare capacity; the creation of an environment less oppressive and security-based than that at Mourne House; improved regime, particularly health-care and visits. It was suggested that the YOC offered a more pleasant environment closer to Belfast than Mourne House and its regime would enable the identification of the individual needs of women.²³

The 'feasibility report', presented to the Prison Service Management Board, concluded that it would be possible to house the women at

¹⁵ HMIP *Thematic Review*, chapter 6 and HMIP *Expectations* section 1.

¹⁶ HMIP *Thematic Review*, chapter 6, and HMIP *Expectations* section 1.

¹⁷ HMIP *Thematic Review*, chapter 11 and HMIP *Expectations* section 2.

¹⁸ HMIP *Thematic review* chapter 9.

¹⁹ HMIP *Expectations* section 5.

²⁰ HMIP *Expectations* section 8.

²¹ HMIP 2002 Mourne House: Women's Unit. Inspection Report on Maghaberry Prison, London, HMCIP, paras MH.06, MH.07, MH.09, MH.10 and MH.11.

²² The Governor at Hydebank Wood was given responsibility for carrying out this feasibility study. Personal Interview with Governor of Hydebank Wood, April 2004.

²³ Interview with Governor of Hydebank Wood April 2004.

Hydebank Wood and that low risk security at Hydebank Wood would not be an issue. The final report to the Prison Service Management Board focused on: privacy; decency; mother and baby provision; health-care; disability; gender-specific programmes; enhanced regimes. It was considered by those responsible for the study that the Inspectorate's 2002 recommendations for change in the Mourne House regime had been adopted and incorporated into the final report.²⁴

While concluding that the transfer of women from Mourne House to Hydebank Wood was feasible, the report also urged that:

... careful consideration would be required in relation to the way in which the NIPS would undertake its business in delivering services to the female population. ... [and that] further consideration be given to the nature of services and facilities on offer to females and the way in which these may impact on them whilst in custody.²⁵

On 24 November 2003 the Board ordered an Equality Impact Assessment (EQIA) on the proposed transfer under section 75 of the 1998 Northern Ireland Act.

The EQIA document claimed to have used "both quantitative and qualitative analysis and consultation with other stakeholders" in reaching its conclusions.²⁶ This included: age, status and home location of women prisoners; gender of prison service staff; views of prisoners and Inspectorate reports. In considering the situation at Hydebank the EQIA identified issues that could have a potential adverse impact on women:

- no in-cell sanitation provision;
- structural changes would be needed to accommodate prisoners with physical disabilities;
- husband and wife immigration detainees would not be housed in one location.

However, problems in the current regime at Mourne House were also identified. These included: lack of mother and baby facilities; less

²⁴ Interview with Governor of Hydebank Wood, April 2004.

²⁵ Northern Ireland Prison Service, 2003, *Transfer of Women in Custody in Northern Ireland: An Equality Impact Assessment*, 24 November 2003, page 9. (Hereafter EQIA).

²⁶ EQIA, Executive Summary, point 3.

access to education for women than men and a disproportionate ratio of male to female officers. The proposed transfer was “founded on the principle of equal and fair treatment for all prisoners and to provide a more cost effective and efficient service delivery through an enhanced regime”.²⁷ Central to this ‘principle’ was the provision of “safe and humane custody”, the reduction of re-offending and assistance to women to lead “useful lives”.²⁸

It “proposed a range of positive measures” to “eliminate any adverse impact for the categories of persons covered by Section 75”. They included: additional programmes; enhanced regime; disability provision; resettlement scheme; video link facilities between establishments; 24 hour access to sanitation; improved health-care; addressing staff ratios; improved gender-related staff training. The Prison Service stated its confidence in establishing and delivering “an acceptable and socially inclusive regime” that would not only be “cost effective” but also would be “innovative”.²⁹ It judged the Mourne House regime “limited and restrictive”, with women denied the facilities available to male prisoners.³⁰ It noted high staffing levels and a gender imbalance in staff which had “result[ed] in an inconsistency in the delivery of services and daily routines”.³¹

In contrast, Hydebank Wood was presented as offering a refurbished and converted unit and a “staff focused integrated regime based on programmes such as education, vocational training and gymnasium activities”.³² YOC prisoners were encouraged “to participate in redressing offending behaviour through a variety of cognitive programmes”. The YOC worked “in partnership with a variety of community based organisations”. Central to its ethos, in contrast with Mourne House, was the “high degree of interaction between staff and inmates” giving prisoners “ownership of the regime, participation and delivery”.³³ It proposed the “delivery of a gender specific health-care programme” and “more suitable programmes, particularly for those serving long sentences”.³⁴ The assessment concluded that the proposed “positive measures” would “eliminate the [identified] instances of adverse impact”.³⁵

²⁷ EQIA Executive Summary, point 6.

²⁸ EQIA, Executive Summary, point 6.

²⁹ EQIA Executive Summary point 7.

³⁰ EQIA page 12.

³¹ EQIA page 12.

³² EQIA page 13.

³³ EQIA page 13.

³⁴ EQIA page 14.

³⁵ EQIA page 21.

The Prison Service consulted over 100 groups on its EQIA³⁶. It is difficult, however, to establish a selection rationale. For example, given that Hydebank Wood operates as a male young offenders centre, it is curious that the key children's NGOs and the Northern Ireland Commissioner for Children and Young People (NICCY) were not approached. The consultation period was extended by several months. Approximately 30 responses were received.³⁷

The EQIA was conducted only in relation to any potential adverse impact on women in prison. No EQIA was carried out regarding any potential adverse impact to the Hydebank Wood young male population, which includes children under the age of 18. However, the possible negative effect of the transfer on the boys and young men at Hydebank Wood was alluded to in the Hydebank Wood Visiting Committee response to the EQIA.³⁸

Differential impact on male and female immigration detainees was considered only in terms of married couples. Currently, both male and female immigration detainees are held in Maghaberry. The EQIA noted that weekly contact could be facilitated through video link between Maghaberry and Hydebank Wood.³⁹

The Commission is unaware of an EQIA regarding potential inequality between male and female immigration detainees. Male detainees are to be housed at Crumlin Road 'working out centre'⁴⁰ while female detainees will be held at Hydebank. The EQIA on the proposed transfer was based on the presumption that male detainees would continue to be held in Maghaberry. Furthermore, the Home Office recently stated that "we have no plans to alter the current arrangements [use of Maghaberry] for immigration detention in Northern Ireland."⁴¹

There were other problems with the consultation process. Although the Prison Service carried out an EQIA of the proposal to move women from Mourne House to Hydebank, and consulted accordingly, it did not consult on any other aspects of the proposed move. Nor did it appear to consider alternative options for the future of women's

³⁶ Listed in Appendix 2 of the EQIA.

³⁷ The Northern Ireland Human Rights Commission was among the consultees. Rather than responding to the EQIA document within the allocated timeframe, the Commission preferred to continue to conduct the current research, to enable it to make more informed comment.

³⁸ Visiting Committee, HY YOC Hydebank Wood, letter to Governor of 10 January 2004.

³⁹ EQIA p.20.

⁴⁰ On the site of the former Belfast Prison, Crumlin Road.

⁴¹ Correspondence to the Lord Hylton from Home Office, undated but referring to his letter to the Home Office of 23 December 2003.

imprisonment in Northern Ireland. There was no public consultation, for example, on continuing to accommodate women at Mourne House but on the basis of the full implementation of the Prison Inspectorate's 2002 recommendations.

From the outset it was clear that a transfer to Hydebank Wood was the preferred option of the Prison Service. In June 2003 the Director General wrote to the Chief Commissioner, "I have a small team working on the possibility of locating female prisoners at Hydebank Wood. ... If favourable, the timing of the move will be affected by operational considerations, not least the growing total prison population, which may add pressure to accelerate the transfer".⁴² In September 2003 the Director General wrote that "the feasibility of moving women prisoners from Maghaberry to Hydebank Wood is under active consideration" and that "it would be more appropriate to undertake the research once a decision on that matter has been taken and, if appropriate, implemented".⁴³ Once the feasibility study confirmed that such a move would be possible the Prison Service appeared committed to implementing the transfer as swiftly as possible. In October 2003 before the EQIA consultation had been conducted the Director General proposed to the researchers that it might be "more appropriate" to delay the Human Rights Commission research "until after the move".⁴⁴

At a meeting with the researchers in February 2004 the Governor of Maghaberry expressed confidence that the move would "happen within two to three months".

Reasons for the transfer: the Governors' views

The EQIA document noted the "limited and restrictive" regime at Mourne House compared with the more open, progressive regime at Hydebank:

Hydebank Wood provides a staff focused integrated regime based on programmes such as education, vocational training and gymnasium activities.... Emphasis is placed on encouraging individuals to participate in redressing offending behaviour... The Governor encourages a high degree of interaction between staff and inmates, emphasis is placed on all

⁴² Letter to the Chief Commissioner NIHR, from the Director General NIPS, 27 June 2003.

⁴³ Letter to the Chief Commissioner NIHR, from the Director General NIPS, 17 September 2003.

⁴⁴ Meeting with Director General, October 2003.

inmates contributing and having ownership of the regime participation and delivery.⁴⁵

The commitment to overcoming the existing ‘intransigent’ regime at Maghaberry has been described as one of the main motivations for the proposed move to Hydebank.⁴⁶ The Maghaberry Governor proposed that lack of progress towards meeting the recommendations of the 2002 Inspectorate Report had been due to industrial relations problems with Mourne House POA and its predominantly male staff. The redeployment of staff from the Maze Prison who were accustomed to dealing with paramilitary prisoners, had compounded difficulties already entrenched in the staff culture. It was a culture of disengagement with few officers prepared to participate in an active and creative regime. The prevailing ethos was one of stagnation in which officers, with few exceptions, did very little beyond the minimum required. As a result, the regime had diminished and prisoners suffered the consequences.

These problems, alongside those of trying to run a women’s unit within a high security adult male prison, would be resolved by the transfer. The Governor stated:

Maghaberry is a complex prison. Mourne House is outside the main walls and is different. It would be better served with one perimeter. Hydebank Wood gives this opportunity and provides shared facilities. It is a good opportunity. More can be advanced in a low risk facility. At Maghaberry there’s always the problem of high security. A good, liberal regime is the objective.

It was hoped that Hydebank Wood would provide a less harsh and austere environment, bounded by fences rather than walls. The issues of high security at Mourne House and the gender imbalance of staff would be addressed. The Prison Service was committed to a “more open regime for women and the deployment of “the right kind of staff”.

The Governor of Hydebank Wood YOC supported this assertion that Hydebank Wood had the potential to offer a more open liberal regime for women prisoners.⁴⁷ At the YOC the “client group” was “very volatile”. During the previous two years, however, a new and effective ethos had emerged and consolidated and there was no reason why the

⁴⁵ EQIA pp.12-13.

⁴⁶ Meeting with the Governor of Maghaberry Prison, February 2004.

⁴⁷ Meeting with the Governor and staff of Hydebank Wood, March 2004.

existing young offenders' regime could not be applied successfully to women prisoners housed in the refurbished Ash House. The recent history of the YOC demonstrated the development of "well motivated and empowered managers" conversant with, and committed to, a progressive regime. The Principal Officer Ash House, and the officers appointed to work with her, would project the "Hydebank Wood ethos". There would be extensive and appropriate induction for prison staff, externally purchased "sourced training" and an estimated 60% (female) to 40% (male) staff gender ratio. Hydebank Wood "will not be two separate entities and women will not be the poor relation".

He recognised the diversity of women prisoners (young offenders; long-termers; immigration/detainees; separation or punishment; remand) but stated that there would be no distinction made between remand and sentenced prisoners. A Prisoner Development Plan would be agreed for and with each prisoner, including those remand prisoners "who have issues". The Plan would be tied to the "positive engagement regime" using a mutually agreed compact to ensure progression. All elements of the existing YOC regime would be adopted to meet the needs of women prisoners: drug reduction programme; through-care and key workers; working from home scheme; positive links with external agencies.

The accommodation would be in Ash House on four landings, two either side of a central pod. Capacity was set at 48 including two converted mother and baby units. On current figures it was expected that there would be approximately six prisoners on each landing, any two of whom could have access to toilets and showers during lock-up.

In response to the Commission's expressed concerns regarding the arrangements for ablutions, the Director General of the Prison Service later explained that:

The 'night toilet', which will also be used during the day, is a separate unit equipped with a toilet and wash hand basin.

In addition there is a single toilet and an area with two screened toilets in the ablutions area. The single toilet is self-contained and although it has a half door to ensure that staff are aware that a prisoner is in this area, the screening complies with legislation and does provide sufficient privacy.

All necessary feminine hygiene equipment will be installed in these areas prior to the transfer.⁴⁸

⁴⁸ Comments from the Director General on the draft of this report, contained in correspondence, June 04.

The Governor described what the 'typical day' would be: 7-30am to 8am start of day, followed by showers etc., breakfast; 9am-12 noon, education and work parties followed by lunch; 12-20pm lock-up; 1-30pm to 4-15pm education and work parties followed by dinner; 4-15pm to 5pm lock-up; 5-30pm to 8pm association; 8-30pm lock-up for the night. The policy would be to "maintain workshops and the regime and to get people off the landings". The YOC offered "better education opportunities" with "additional resources" provided on the basis of "individual needs assessment". He expected that eventually workshops would be "mixed sex", including the kitchen. As the grounds were just "one area" he envisaged mixed work parties. Women's "possible access to male dominated workshops" would be subject to a "risk assessment". Association on the landings would be "seven nights a week".

The Hydebank Governor recognised that the Inspectorate had recommended "discrete accommodation" for women prisoners. In carrying out the feasibility study he "had to look at making the best move possible" within the limitations of the existing facility and regime. He was confident of staff support; "the POA here are most reasonable and work on the basis of partnership". Hydebank Wood would be a "settled site, a settled prison and a much reduced security culture". The under-18s would have a separate landing governed by "child protection measures". He knew "exactly how many staff I need to run Ash House". In addition to 36 officers he would require a probation officer, a psychologist, a full-time and two part-time teachers and two physical education staff (including ante natal and post natal work). There would be a new training programme for physical education instructors.

In commenting on the draft of this report the Prison Service confirmed that 36 officers and several senior members of staff would be supplied. Additional specialists would include 6 additional nurse officers and a higher psychologist with responsibility for developing gender specific programmes. Existing part-time teachers in Mourne House will transfer as well as the existing Probation Officer and current groundsperson. An additional physical education instructor would be provided.⁴⁹

While recognising the legitimacy of concerns raised in the consultations, the Hydebank Governor considered that in the main they revealed a "lack of understanding". The anxiety felt by women

⁴⁹ Director General comment on draft report, June 2004.

prisoners had been “fuelled by misconception”. He accepted that in-cell sanitation was a “big issue”. Given that the cost of converting Ash House entirely to in-cell sanitation was “too great”, the electronic unlock system was a “perfectly acceptable alternative”.

The Mourne House Prison Officers’ Association View

In its consultation submission the Mourne House Branch of the Prison Officers’ Association (MHPOA) stated that the transfer had been inevitable so that officers could “be redeployed in a bid to cut costs at the expense of female inmates who will see a massive decline in their accommodation standards and regimes”. While accepting that changes at Mourne House were necessary, the transfer was neither feasible nor desirable as the “current standards of regime and accommodation cannot be maintained or enhanced”. The MHPOA questioned whether accommodation “designed to be used by short-term young offenders” could be adapted for use by the range of women prisoners. Lack of in-cell sanitation, communal ablutions, no infrastructure for female work parties, shared gymnasium, education and health-care facilities were each issues of concern.

In a research interview⁵⁰ the MHPOA representatives were scathing about management’s role in the diminution of the regimes and conditions at Mourne House. When opened in 1986 it had been a “breath of fresh air”, the “flagship of the Northern Ireland Prison Service”. But “whatever the prisoners had when it opened was the best they ever had”. It had been “allowed to deteriorate over the years ... left behind in a time warp”. The Prison Service regarded it as a “side-show, an irrelevance”. It was self-evident from the discussions held between the MHPOA and the Governor of Maghaberry that he wanted “rid of Mourne house”. While the Governor considered the staff redeployed from the Maze to be disengaged from prisoners, wanting an undisturbed life, the MHPOA portrayed its members differently: “approximately 40 staff came from the Maze each with 15 to 20 years experience ... over half the staff had jailcraft built in [with] all that experience, skills and commitment to use”.

Mourne House had never had a discrete governor and the MHPOA considered that this omission had compounded the under-resourcing of the Unit. Although the raw figures showed the *per capita* cost of women in prison in Northern Ireland to be excessive, the Unit’s kitchen and workshops had been mothballed and the potentially excellent health-care facility did not provide round-the-clock care.

⁵⁰ March 2004.

The Unit's Principal Officer post had a high turnover and there was an institutional failure to accept that "the female estate is different and has to be managed differently". According to the MHPOA the Unit was seen by management "as a thorn in the side of Maghaberry and they want rid of it". What was needed was acknowledgement that it "is a purpose-built women's prison", that management "had not done a good job" and that the "Hydebank resources" should have been used to upgrade Mourne House, enabling women prisoners to receive comparable opportunities to those offered to men.

Appended to the MHPOA submission was a letter, dated December 2003, from the Prison Service Director of Finance and Personnel to Governing Governors in which she stated that the transfer was "expected to occur in Spring 2004". She defended the transfer as a cost-effective necessity. Consequently the MHPOA criticised the Prison Service Director General's "pretence" that the intention was primarily "to make better provisions for women in custody".

The Boards of Visitors' Views

Such 'pretence' was a concern of the Hydebank Wood Visiting Committee (HWVC) in its response to the consultation:

While the transfer is presented as a move to improve the regime for women prisoners, it has been clear to the Committee since the transfer was first mooted that the reasons behind the proposal are those of efficiency in the use both of staff and the prison estate. The Committee has no quarrel with those objectives, but it would like the move to be recognised for what it is – a rationalisation in the interests of reducing costs.⁵¹

The HWVC noted a "significant improvement in the regime" at Hydebank Wood. It had been "achieved against a background of cutbacks and declining resources, and despite the difficulties caused by major refurbishment, a sharply rising inmate population, and the impact of the current breakdown in industrial relations in the Service". Success had been secured by a "small and highly committed management team whose resources are stretched to the limit". The transfer would increase "managerial complexity". A key issue was the danger of a "deterioration in the regime for male inmates at Hydebank".

⁵¹ Visiting Committee HM YOC Hydebank Wood, letter to the Governor, January 2004.

Following their recent visit to Mourne House the HWVC noted the “understandable anxiety among staff and prisoners alike ... heightened by the lack of hard information about the precise nature of the facilities and regime to be provided at Hydebank”. It concluded that the standard of accommodation at Mourne House, alongside “dedicated education and recreation facilities” could not be equalled at Hydebank Wood. Cell size was “an important issue and will become even more so when proposed European standards have to be applied”. Given that facilities would have to be scheduled for joint use, the transfer would constitute “a move to a physical environment and plant that does not match that of Mourne House”.

The HWVC recorded its concerns about: the feasibility of additional programmes for women “given the difficulties in recruitment of staff for existing educational programmes”; the capacity within resource allocations to deliver an enhanced regime for women; the “complex issue of sanitation and personal modesty; loss of privacy and possible verbal abuse from male young offenders; provision of appropriate psychiatric care; adequate training for prison staff. While expressing “very real concerns about the effective delivery of measures envisaged in the consultation document” the HWVC concluded: “if, and only if, the management and staff at Hydebank are given the support and resources they need, they have the commitment and ability to provide an acceptable environment and regime for Northern Ireland’s women prisoners”. Finally, the HWVC noted its “concern that decisions have already been taken ahead of this consultation process”.

The Maghaberry Board of Visitors (MBOV), which has responsibility for the Mourne House Unit, was less equivocal in its response to the consultation document. It “fails to see how a transfer from a purpose-built complex less than 20 years old to a single house in a centre built for young offenders” meets the Prison Service’s stated ambition to achieve “better provision for women in custody”. The “welfare and health (mental and physical) of the prisoners involved” was of “paramount importance”.⁵² Having conducted extensive consultation with women prisoners in Mourne House, each well known to the Board, the MBV considered it was “in a position to represent their views and anxieties”. It was concerned that the consultation document failed to consider the baseline requirements for women in custody of “total physical separation, separate catering, health-care facility, education, visiting, PE, management and staffing” recommended by the Prison Inspectorate’s *Women in Prison: A Thematic Review*.

⁵² Board of Visitors/Visiting Committee HMP Maghaberry, *Response to Equality Impact Assessment on Proposed Transfer of Female Prisoners to Hydebank Wood*, January 04.

Lack of in-cell sanitation and personal washing facilities had created the “most anxiety to female prisoners of all ages who are accustomed to having their own facilities”. Having experienced such basic facilities, their removal would be viewed “as punitive”. It posed a “real equal opportunity issue” as “all adult male offenders in Maghaberry have in-cell sanitation”. The MBOV viewed the reduction in the number of accommodation landings available as limiting the capacity to enable “special provision for life-sentence prisoners who already feel that their opportunities are very limited in comparison to male lifers”. While acknowledging the enthusiasm of the Hydebank Wood staff and their commitment to initiating a “good regime with ample time out of cell”, the MBOV was not convinced that appropriate programmes would be provided and that current education and work-party opportunities would be lost. The “thought of sharing health-care facilities” was a particularly daunting prospect for the women prisoners.

The MBOV considered that the Prison Service would “undoubtedly face legal challenges on the grounds of lack of equality of treatment of male and female prisoners”. The issue of ‘cost effectiveness’ cut no ice with the Board. In a clear reference to the costly conversion of two units to house male paramilitary prisoners at Maghaberry, the MBOV concluded: “the level of recent expenditure on particular groups of prisoners has clearly demonstrated that money can be found, when it is expedient”.

On 4 May 2004 the MBOV visited Hydebank Wood. Members were “particularly impressed by the dynamic and humane attitude of the Governor”, they noted the “ethos of personal development in the YOC” and were reassured by the “Governor’s confidence” that his staff could manage and curb any potential harassment of women prisoners by male young offenders. Yet they reaffirmed their concerns regarding cell size, the absence of in-cell sanitation, the mixing of remand and sentenced prisoners and the “complication” of handling “interactions between the sexes”. While commenting favourably on the “plan to manage disturbed and troubled females on the residential landing through interaction and intervention” between staff and prisoners, they restated the need for officers and managers to receive “specific training and monitoring”. Overall the visit reinforced their initial judgement that the “physical facilities” were definitely not as acceptable as those in Mourne House”. They “regretted that this move has been put into action in spite of the recommendations ... previously made”. They concluded:

We sincerely and honestly hope that the decision having, regrettably, been made to move the women, sufficient time will be allowed for all the facilities and training to be PROPERLY

completed before the transfer occurs. Rushed and occasionally ad hoc administration could have far-reaching repercussions ... These disturbed and often damaged women and children require security and appropriate treatment... (emphasis in original).⁵³

The Women Prisoners' View

It was clear from the research interviews⁵⁴ that women prisoners had not been provided with information regarding the proposed move: “we just know it’s going to happen but we don’t know when and we don’t know what it will mean for us ... all the girls [women] are uptight”. The lack of dependable information had led to rumour which had exacerbated their apprehension. It was also evident that rumours had been fed by officers whose motives were not necessarily consistent with the women’s best interests. Lack of hard information or consultation, as the research demonstrates, was not confined to the move: “from our arrival onwards we are the last to find out what’s really happening”. Several women “wrote to Hydebank but I don’t think they took any notice”.

The main concern voiced by all women prisoners was that they would have to live in a predominantly male environment where core facilities would be shared. Their previous experiences of being transported in prison vans with male prisoners had been threatening: “they shout abuse at you and try to get you to tell them your name ... it’s awful especially when you’re already low or depressed”. Shared transport was a practice condemned by the Inspectorate’s Report. Women prisoners feared that these experiences would be commonplace at Hydebank Wood: “They’ll shout out when you’re being moved, on outside recreation or in your cell, whether they can see you or not. That’s what they’ll do. If they know your name we’ll get it all the time”. As many women in prison “are victims of domestic violence and are mentally fragile”, the view was expressed that living in a male prison would constitute an “abuse” and “demotion of basic rights”. The women’s appalling experiences of having to share the Maghaberry prison hospital had made them particularly concerned about sharing health-care facilities at Hydebank Wood. Young women were worried that “lots of the boys will know us anyway and just give us a hard time with name-calling and the like”.

In-cell sanitation and shared ablutions were major concerns:

⁵³ MBOV, *Report on Visit to HM Young Offenders’ Centre*, Hydebank Wood, 4 May 2004, p.4.

⁵⁴ Interviews with women in Mourne House conducted between March and May 2004.

It's awful. We're used to having our own screened toilet and washbasin. Now we're having them taken away.

In my opinion you don't only need your own toilet, you need your own sink, to clean your teeth, to wash your hands. There's lots of things you do where you need to have a quick wash of your hands.

No sanitation in cells ... that is a big problem because women need sanitation, like, on their monthly cycle. I know myself I run to the toilet a lot and they're only going to let you out one or two at a time at night. It's demeaning.

We're all women, yes, but if you're on your period you're not wanting to be standing next to another woman showering.

They're building cells for the male side where the toilets in cells will have doors ... so why are we being pushed back in time when the men are being pushed forward? Where's the equality in that? Is it because there are so few women that we're being pushed back?

We can't even wash our underwear in our cells and put it on the radiator.

There were also concerns over bouts of stomach sickness when several women at a time might need to access toilets or when individuals might need to use the toilet frequently. Again, every woman interviewed felt that this raised fundamental issues of privacy and dignity. The long-termers and lifers considered that the 'enhanced' regime to which they were entitled could not be provided in an environment that did not provide basic facilities. "What are the possibilities of getting a proper lifer wing? I really don't think it's fair to expect lifers to mix with YOs and remands and short-termers." During the 2003 summer "it was dreadful at Mourne House with the mix on the landing ... sheer hell we lived through".

The lifers were worried that they would not be able to handle the transfer:

It took me [a long time] to settle here ... now I'm to be uprooted. How long will it take me to settle there? I'm really used to being here ... it's just not fair and they are taking us back in time.

Surely if they're going to move us they should be taking us ahead in time, improving things instead of taking things away.

And the fear of not being able to cope with the transfer was clear:

I'll be honest with you, if this move takes place I don't know how I'll survive because I'm absolutely no good with confrontation. You might think I'm assertive ... It's got that way that you don't voice anything and I can't see how I could handle the things we'll face with the move.

The impending transfer had "put a dampener on everything" for nearly two years and, according to the women, this had led to a deteriorating regime at Mourne House and a lack of investment in the Unit. The issue was addressed clearly by one of the women:

Realistically, I am aware there is no more finance available to make changes at Mourne House. But money isn't the problem here as there are already adequate facilities at hand. The problem lies in the lack of motivation to administer fundamental changes that would involve structural management, effort and enthusiasm.

The women were unrelenting in their criticisms of the Mourne House regime, while recognising the commitment of a small minority of dedicated staff. They spoke of the virtual collapse of enhanced status, the rarity of full unlock in the evenings, the lack of telephone access, the conditions under which children made visits to see their mothers; the closure of the kitchens and workshops, the under-utilisation of the Unit's health-centre, the negative attitude and vindictiveness of many of the officers, the lack of access to education despite there being a committed teaching staff, minimal psychiatric and counselling support and the failure to provide creative programmes. Yet they did not consider that Hydebank Wood could provide a solution to these problems. The losses regarding personal hygiene, privacy and dignity outweighed any gains that might ensue from being in a lower security prison.

In May 2004 a delegation of staff from Hydebank Wood visited Mourne House to provide information for the women regarding the move. The opportunity to discuss arrangements was welcomed by the women and the more positive attitude of the Hydebank management was recognised. However, none of the assurances provided (for example

that there will be more association time and greater access to education than in Mourne, or that women can decorate their own cells) allayed fears regarding issues of sanitation, privacy and proximity to a young, male population.

The women were perplexed that the regime described at Hydebank could not be provided within the Mourne House unit, with the added benefit of physical separation from the male estate and its extensive gardens which the women had worked hard to develop and maintain. However, the women were unanimous that the regime at Mourne House required a fundamental and thorough overhaul.

Conclusion

It is clear from the documentary analysis and the research interviews that the decision to move women prisoners from Mourne House to Hydebank Wood was taken prior to the Equality Impact Assessment consultation and was based primarily on financial considerations reinforced by the overall operational imperatives at Maghaberry with its expanding male population.

The climate created by the decision to transfer, led to a further and serious deterioration in all aspects of the regime at Mourne House and to the under-utilisation of key facilities. This process, coming hard on the heels of a critical and negative Inspectorate report, was unacceptable and compromised the health and wellbeing of women in custody.

At a time when the Prison Service should have mobilised urgently its resources, management and staff to rectify the serious shortcomings identified by the Inspectorate it allowed the regime to drift and stagnate. Management holds prison officers and their representatives responsible for this sorry state of affairs while the MHPOA points to an abdication of managerial responsibility. Whatever the circumstances of recent industrial relations disputes, it has been women prisoners who have suffered. In the final analysis the responsibility for providing a positive and constructive environment, adequate and appropriate care, rehabilitative and supportive programmes for women in custody rests with the Director of the Prison Service and the Prison Service Management Board. While the working practices adopted by many, but not all, prison officers fall short of minimum professional standards, the Prison Service HQ should have resolved the worsening situation at Mourne House.

Following its 2002 visit to Maghaberry the Inspectorate made many recommendations concerning women and girls in custody in Northern Ireland. These reflected the development within England and Wales and Scotland of a new direction in policy regarding women's imprisonment. The Northern Ireland Prison Service seemingly ignored the generic and specific aspects of the Inspectorate's Report.

The EQIA consultation document makes reference to the *Thematic Review of Women in Prison (2001)* stating that this "offers a template of how women should be managed in a mixed gender facility and highlights best practices in relation to accommodating both males and female in one establishment".⁵⁵

There is no acknowledgement here of the Inspectorate's view that "at present, the sharing of sites does not work to the benefit of the female prisoner population".⁵⁶ In England and Wales the decision to situate some female establishments within male prisons is endorsed by the Inspectorate only to ensure "as wide a geographical provision of accommodation as possible" so that women can be held close to their homes. However:

There is an inevitable tension between the two options: on the one hand attempting to locate women as close to home as possible but thereby marginalizing them because they represent tiny groups in male prisons; on the other hand concentrating them in a few prisons dedicated to women only, thereby placing them far from home.⁵⁷

The need to situate women as close as possible to their homes was not identified by the Northern Ireland Prison Service as a significant factor in the decision to move from Mourne House to Hydebank thus lessening any possible justification for situating the proposed female unit within a male young offenders institution.

Nor does the Northern Ireland Prison Service go on to acknowledge the Inspectorate's specific safeguards to be adopted where a women's unit is situated within a male establishment:

- total physical separation;
- a separate identity reinforced by distinct management and staffing team;

⁵⁵ EQIA p.12.

⁵⁶ HMIP *Thematic Review*, para 3.11.

⁵⁷ HMIP *Thematic Review*, 3.10.

- separate costing arrangements and management accounting systems to attribute costs of shared services;
- discrete objectives;
- separate visiting facilities;
- separate catering facilities;
- separate health care;
- separate education, employment and physical education facilities.

In contrast, the Northern Ireland Prison Service has demonstrated little understanding of the “blinding glimpse of the obvious” that “women in prison should be treated differently than men”.⁵⁸ Consider its responses to issues regarding women’s treatment raised by Maghaberry Board of Visitors in its Annual Report:

[on a request for women to be allowed to cook all their own food] ... it would not be appropriate to allow female prisoners to cook their own food while males are not permitted to. It is essential that we have transparent fairness across the board.

[on concern about the high proportion of male to female staff in Mourne House] the proportion of male to female staff is based on a Genuine Occupational Qualification (GOQ). The current ratio is well within the GOQ for Mourne House.

[on a recommendation to create a prison “entirely geared to the needs of female prisoners”] The feasibility study reviewing the proposal to transfer female prisoners from Mourne House to Hydebank Wood had a clear brief to ensure that the regime available to females is similar to that available to male prisoners in so far as this is practicable given the number of females in custody and the range and types of sentences being served.⁵⁹

The Northern Ireland Prison Service has failed to provide the necessary safeguards for female prisoners in a male prison in the Mourne House context and has not demonstrated that it can meet them at Hydebank. In deciding to transfer women and girl prisoners to Hydebank Wood little consideration appears to have been given to the central issues of concern raised by the Inspectorate and its recommendations.

⁵⁸ Sir David Ramsbotham, Former Chief Inspector of Prisons in *HMIP Follow-up*, Preface.

⁵⁹ Northern Ireland Prison Service, Response to issues raised by Maghaberry Board of Visitors in their Annual Report (2002-2003).

A comprehensive and strategic review of women's imprisonment has not taken place and there has been no discrete allocation of managerial duties at HQ or at Mourne House. The lack of a senior manager and governor dedicated solely to identifying and assessing the needs of women and girls has compounded their marginalisation within the overall prison population. At Hydebank Wood there will be a single healthcare facility, and mixed sex facilities in the kitchen and visiting areas. "Everything else will be timetabled so that all contact will be kept to a minimum if at all."⁶⁰

The installation of in-cell sanitation was one of the main recommendations of the Woolf report, published in 1991, after the Strangeways riots. Yet, the Northern Ireland Prison Service is electing to move women prisoners from cells with in-cell sanitation to cells with no such amenities. On the lack of in-cell sanitation the EQIA simply noted that "the proposed accommodation does however have sufficient sanitary provisions, identical to those provided to the majority of inmates in Hydebank Wood and similar to those in other prison establishments."⁶¹

At Bulwood Hall women's prison in Essex, cells have no internal toilets and at night women are automatically unlocked if they wish to use the toilet. Security procedures dictate that they are unlocked one at a time and "in practice long delays are inevitable and some inmates, including juveniles and pregnant women, are reduced to using 'potties'".⁶² While the Hydebank arrangement will allow two women on any landing to be let out at once, there can be no guarantees that women will not have to wait for access to the toilet and washing facilities at night or early morning.

The Prison Service has shown no perception of issues regarding personal hygiene, shared ablutions and the significance of privacy, especially regarding menstruation. In interviews with senior managers the focus when questioned about these issues seemed entirely on where women would go to the toilet. The Director General's response to the Commission's concerns in this area was that "we are fully away of the issues in this area [privacy and menstruation] and arrangements are in place to provide privacy for such individuals".⁶³

⁶⁰ Comments from the Director General on the draft report, June 04.

⁶¹ EQIA p.17.

⁶² *Guardian* newspaper, 5 May 2004.

⁶³ Director General response to draft report, June 2004.

It is extraordinary that the problems that stem directly from holding women and girls in a discrete unit within the outer walls of a high security adult male prison should be tackled by a transfer to a house within the fences of a lower security male young offender's institution. While a reduction in security levels is long overdue, the designated house is adjacent to a house accommodating young men. There are profound implications in this decision for the women and girls and also for the boys and young men. No evidence was provided to suggest that these implications had been explored and translated into operational policies and anticipated practices. It is to be expected that women prisoners, several of whom are high profile cases, will receive constant abuse from young male prisoners housed close by. Girls and young women often will be known to male young offenders. Again, intimidation and harassment will be constant and difficult to regulate and police.

The enthusiasm and commitment of the Hydebank Wood Governor is well-documented and was clearly evident in interview. His belief, however, that the Hydebank Wood ethos, regime and programmes can be operationalised for women and girls takes no account of the particular needs of women and offers scant reassurance that an assessment of those needs is necessary. While the reasons behind his intention to aim for mixed education, mixed work parties and other mixed facilities are positive they appear naïve. They also fail to address the important issue of women-only space particularly in circumstances of high vulnerability.

It appears that Hydebank Wood, with spare capacity, provided an 'easy way out' of the industrial relations problems at Mourne House; reducing costs while ending the added complication that Mourne House had become for Maghaberry. In terms of penal policy and best practice no convincing case has been made to support the choice of Hydebank Wood.

A consequence of the proposed transfer was the refusal of two republican women prisoners to make the move. They threatened to go on hunger strike should there be any attempt to move them to Hydebank Wood. Arrangements had been in place for their transfer but a decision was then made to accommodate them in separation at Maghaberry. While it is appropriate that women should receive equal treatment to male prisoners regarding separation their accommodation in a high security male prison is not a satisfactory solution, neither would be their transfer to Hydebank Wood.

It is instructive that when asked the question, “If a women’s prison was purpose-built to meet the standards required would Ash House at Hydebank Wood be acceptable?” each senior manager replied, “Of course not”. The Prison Service’s response to this statement is that “very little of our residential accommodation is anywhere near ideal”.⁶⁴

The Hydebank Wood Governor is confident that the staff necessary to meet the needs of the transfer will be provided. The criteria used to deploy staff are not clear and there are serious issues here regarding staff selection and training. Although the Inspectorate recommended the appointment of a dedicated governor, Ash House is to be managed by a female principal officer. There appears to be an assumption that certain staff are suited to work with women prisoners rather than a well conceived programme of recruitment and training in the context of a gender-specific strategy. This issue is most apparent with regard to dealing with vulnerable and troubled women. Responding to their complex and challenging needs both on the landings and in the health-centre requires carefully planned policies and practices within a framework that reflects an understanding of self-harm and suicide. This has not been addressed at Mourne House and a recently published *Howard League* report raised concerns about difficulties in Hydebank regarding healthcare particularly relating to prisoners who were suicidal and self harming.⁶⁵ The Prison Service has disputed the Howard League’s conclusions.

In conclusion, while the current research will demonstrate the unacceptability of the regime at Mourne House, any suggestion that the imminent transfer to Hydebank Wood offers an adequate resolution to the complex and deep-seated problems identified would be disingenuous. It is evident from the documentation presented here that the primary driver behind the transfer is cost efficiency and not the advancement of a humane regime appropriate to the assessed and acknowledged needs of women and girls. Further, it is clear that the transfer was, from the delivery of the feasibility study, a ‘done deal’. This rendered impotent the Section 75 Equality Impact Assessment and its seriously flawed consultation. The speed with which the transfer is scheduled to take place raises the further concern that the refurbishment will not have been completed and appropriately trained staff will not be in place. The first months of the transfer will be traumatic for the women yet the facilities essential for their care will not be in place.

⁶⁴ Comments on draft report in letter from Director General, June 2004.

⁶⁵ Howard League, 2003, *Suicide and self-harm prevention: A strategy for Northern Ireland*, 2003, p.9.

It is therefore recommended that:

- 1. Given the weight of opposition to the transfer recorded here, the issues raised and recommendations made by the 2002 Inspection of Mourne House, the need to consult more fully with NGOs and other parties and, not least, the concerns expressed by women prisoners, the transfer should not go ahead.**

- 2. A comprehensive and informed consultation should urgently be conducted on the future of women's imprisonment in Northern Ireland. This should involve a broad range of bodies with a legitimate interest in the issue of custody for women. In keeping with international human rights standards and the recommendations of the Prisons Inspectorate, the objective of this consultation should be the development of a discrete strategic plan for holding women and girls in custody to be based on total separation from the male estate in management, facilities and regimes.**

References

HM Inspectorate of Prisons (1997) *Women in Prison: A Thematic Review*, London, Home Office.

HM Inspectorate of Prisons (2001) *Follow Up to Women in Prison: A Thematic Review*, London, Home Office.

HM Inspectorate of Prisons (2002) *Mourne House: Women's Unit. Inspection Report on Maghaberry Prison*, London, HMCIP.

HMP Maghaberry Board of Visitors (2004) *Response to Equality Impact Assessment on Proposed Transfer of Female Prisoners to Hydebank Wood*, Lisburn, MBOV, 12 January.

HMP Maghaberry Board of Visitors (2004) *Report on Visit to Young Offenders' Centre Hydebank Wood*, Lisburn, MBOV, 4 May.

HMYOC Hydebank Wood Visiting Committee (2004) *Transfer of Women in Custody in Northern Ireland*, Belfast, Visiting Committee, 16 January.

Northern Ireland Prison Service (2003) *Transfer of Women in Custody in Northern Ireland: An Equality Impact Assessment*, Belfast, NIPS, 23 November.

Prison Officers' Association, Mourne House Branch (2004) *A Submission to the Public Consultation on the Transfer of Female Prisoners from Mourne House to Hydebank Wood*, Maghaberry, MHPOA.